<div align="center">**REMARKS/ARGUMENTS**</div>

Claims 1-15 were rejected under 35 U.S.C. §103(a) as being unpatentable over Nachef, US 2002/0137545 A1, in view of Proust et al., U.S. Patent No. 6.216,014 B1. Reconsideration of the rejection is respectfully requested.

In support of the rejection of independent claims 1 and 9, the Examiner admits that, "**Nachef** explicitly fails to disclose that the array manager module receives at least one instruction for <u>operating on at least one piece of data contained in an array of a specified application.</u>" (Office Action, page 3, lines 16-18; emphasis in original).

However, the Examiner indicates that Proust et al. teaches an

> "array manager module that receives at least one instruction for operating on at least one piece of data contained in an array of a specified application (= SMS-C3 sends enhanced short message to SIM modules 5, see col. 10, lines 53-67; SIM module 5 has Command execution means 6, see col. 10, lines 36-56; enhanced short message body 22 includes remote command such as SELECT, UPDATE BINARY, SEEK, UPDATE RECORD, CREATE FILE, CREATE RECORD etc, see col. 10, line 64-col. 11, line 13; and each file elementary system file contains information, see col. 7, lines 8-42); ...
>
> a receiver operable for receiving from the specified application a requested reference for said array (= each file elementary system file contains information, see col. 7, lines 8-42; system file locator information needed to read into elementary file, see col. 7 lines 24-48; and command to access file, see col. 8 lines 19-25)
>
> the accessing device being operable for accessing said array based on said reference (= each file elementary system file contains information, see col. 7, lines 8-42; system file locator information needed to read into elementary file, see col. 7 lines 24-48; and command to access file, see col. 8 lines 19-25) and,
>
> apparatus operable for performing at least one operation on said at least one piece of data in said array, according to said at least one instruction, without the necessity of deleting and rewriting the entire specified application stored on the card (= updates user card objects, see col. 3, lines 45-53; col. 11, lines 1-13 and col. 15, lines 63-67)."

(Office Action, page 4, lines 5-12; page 4, line 17, to page 5, line 7).

From page 4, lines 5-12, and page 4, line 17, to page 5, line 7, of the Office Action, quoted above, it appears that the array of independent claims 1 and 9 is being equated to the elementary system files of Proust et al. Furthermore, Proust et al. appears to disclose that the elementary system files are stored in data storage 8, (see, e.g., column 12, lines 46-57; column 14, lines 28-36). However, data storage 8 supports all applications, local or remote, that the SIM

module can execute by storing all the data that the supported applications must be able to access when they are being executed. Data storage 8 is separate from program memory 7 storing the GSM application or, more generally, the principal telephone application, and possibly other local applications, (column 10, lines 39-46; Fig. 1).

Thus, it may be concluded that elementary system files, apparently being equated by the Examiner to an array of an application of independent claims 1 and 9, are not contained in program memory 7, which includes the principal telephone application and possibly other local applications for a mobile station 1, (column 10, lines 30-32).

In contrast, independent claims 1 and 9 have been amended to provide that the array is contained in an application stored on an integrated circuit card of a mobile telephone device. Antecedent basis for the amendment to independent claims 1 and 9 is found in the specification, for example, on page 8, lines 17-18, and in the drawings, for example, in Fig. 2.
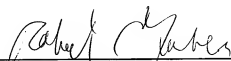
Since each of claims 2-8 and 10-15 is directly or indirectly dependent upon one of independent claims 1 and 9, each of claims 2-8 and 10-15 is allowable for at least the same reasons recited above with respect to the allowability of the appropriate one of independent claims 1 and 9.

In view of the foregoing amendments and remarks, allowance of claims 1-15 is respectfully requested.

Respectfully submitted,

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